

UNITED STATES DISTRICT COURT
DISTRICT OF SOUTH CAROLINA
SPARTANBURG DIVISION

JANE DOE,

Plaintiffs,

vs.

LIMESTONE UNIVERSITY F/K/A
LIMESTONE COLLEGE, COLLINS
MURPHY, MG FREESITES, LTD., d/b/a
PORNHUB.COM, and HAMMY MEDIA
LTD. d/b/a XHAMSTER.COM,

Defendants.

Case No.: 7:21-cv-03193-JD

ANSWERS TO LOCAL RULE 26.01 INTERROGATORIES

The Plaintiff, pursuant to Local Civil Rule 26.01 D.S.C., respectfully submits the following answers to the Court's standard interrogatories.

(A) State the full name, address, and telephone number of all persons or legal entities who may have a subrogation interest in each claim and state the basis and extent of that interest.

RESPONSE: Plaintiff is unaware of any subrogation interest at this time. Plaintiff reserves the right to supplement this response.

(B) As to each claim, state whether it should be tried jury or nonjury and why.

RESPONSE: Plaintiff's claims are for damages for personal injury caused by Defendants, and thus the case should be tried to a jury. Plaintiff reserves the right to supplement this response.

(C) State whether the party submitting these responses is a publicly-owned company and separately identify (1) any parent corporation and any publicly-held corporation owning ten percent (10%) or more of the party's stock; (2) each publicly-owned company of which it is a

parent; and (3) each publicly-owned company in which the party owns ten percent (10%) or more of the outstanding shares.

RESPONSE: Not applicable.

(D) State the basis for asserting the claim in the division in which it was filed (or the basis of any challenge to the appropriateness of the division). *See* Local Civ. Rule 3.01 (D.S.C.).

RESPONSE: Jurisdiction is proper in this Court as the matter in controversy exceeds \$75,000.00, exclusive of interest and costs, and is between citizens of different States. Venue is proper in this Court as a substantial part of the events complained of herein occurred in Gaffney, Cherokee County, South Carolina.

(E) Is this action related in whole or in part to any other matter filed in this district, whether civil or criminal? If so, provide (1) a short caption and the full case number of the related action; (2) an explanation of how the matters are related; and (3) a statement of the status of the related action. Counsel should disclose any cases that *may be* related regardless of whether they are still pending. What cases *are* related such that they should be assigned to a single judge will be determined by the clerk of court based on a determination of whether the cases arise from the same or identical transactions, happenings, or events; involve the identical parties or property; or for any other reason would entail substantial duplication of labor if heard by different judges.

RESPONSE: Plaintiff is aware of two related actions in this District.

Jane Does 1-9 v. Murphy et al - 7:20-cv-00947-JD

Arnette et al v. Limestone College et al – 7:20-cv-04260-JD

These matters are related as they share the same circumstances and facts. The Plaintiffs in each matter were victim to the surreptitious filming by Defendants.

To Plaintiff's knowledge, the status of each of the related matters is the same. Each matter is within the Discovery phase of the litigation.

Plaintiff reserves the right to supplement this response.

(F) [Defendants only.] If the defendant is improperly identified, give the proper identification and state whether counsel will accept service of an amended summons and pleading reflecting the correct identification.

RESPONSE: Not applicable.

(G) [Defendants only.] If you contend that some other person or legal entity is, in whole or in part, liable to you or the party asserting a claim against you in this matter, identify such person or entity and describe the basis of said liability.

RESPONSE: Not applicable.

Respectfully submitted,

BELL LEGAL GROUP, LLC

s/J. Edward Bell, III

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